

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                   ) Case No. 2:22-cv-04027-MDH  
                                  )  
v.                             )  
                                  )  
JOHN HUGO EICKHOFF, JR.,   )  
RHONDA KAY EICKHOFF,       )  
HOFFMAN ASSOCIATES, LLC,   )  
ARIC ELLIOT SCHREINER,     )  
COLUMBIA CPA GROUP LLC,   )  
JOHN WILLIAM GRAY II, and   )  
DAMON THOMAS EISMA, individually   )  
and d/b/a DAMON T. EISMA    )  
Attorney at Law,             )  
                                  )  
Defendants.                  )

**MOTION FOR LEAVE TO FILE REPLY IN SUPPORT  
OF MOTION TO WITHDRAW OUT OF TIME**

COMES NOW, counsel for Defendants John Hugo Eickhoff, Jr. and Hoffman Associates, LLC (“Eickhoff Defendants”), respectfully moves for leave to file a Reply in Support of Motion to Withdraw out of time. In support thereof, counsel states as follows:

1. On November 19, 2024, counsel for the Eickhoff Defendants moved to withdraw from their representation of Defendants indicating that Counsel and the Eickhoff Defendants have reached an unavoidable conflict.
2. That same day, the Government responded without opposition to the Motion as to counsel’s request to Eickhoff under certain conditions and in opposition to the Motion as to Hoffman.
3. Although a reply, if any, was due on or before December 3, 2024, a delay occurred due to the intervening holiday and counsel seeks to address the Government’s requests to avoid

any additional burden on the Court.

4. The proposed reply brief is attached hereto as Exhibit A.

WHEREFORE, counsel respectfully requests leave to file a Reply in Support of the Motion to

Withdraw out of time.

Dated: December 9, 2024

Respectfully submitted,

HUSCH BLACKWELL LLP

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*Attorneys for Defendants John Hugo Eickhoff, Jr.  
and Hoffman Associates, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served by filing a copy of the same with the Court's electronic filing system this 9th day of December, 2024.

/s/ Steven E. Holtshouser